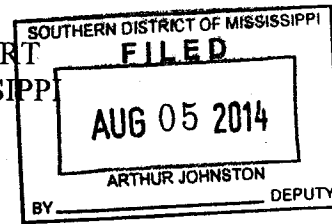


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *3:14-cr-110-HTW-FKB*

TRAVIS BUTLER,
CHESTER BRAD WILLIAMS, and
DAVID LUCAS WIMBERLY

16 U.S.C. § 1538(a)(1)(B)
16 U.S.C. § 1538(a)(1)(D)
18 U.S.C. § 1001
18 U.S.C. § 1512(b)(2)(B)
18 U.S.C. § 1512(k)

The Grand Jury Charges:

COUNT 1

On or about January 4, 2014, in Lauderdale County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TRAVIS BUTLER**, did knowingly and unlawfully solicit and cause another to kill a Louisiana Black Bear, a threatened species listed under the Endangered Species Act, in violation of Sections 1538(a)(1)(B), 1538(g), and 1540(b)(1), Title 16, United States Code and Sections 17.21(a) and (c)(1) and 17.31, Title 50, Code of Federal Regulations.

COUNT 2

On or about January 4, 2014, in Lauderdale County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **TRAVIS BUTLER**, **CHESTER BRAD WILLIAMS**, and **DAVID LUCAS WIMBERLY**, did knowingly and unlawfully possess, deliver, carry, and transport a Louisiana Black Bear, a threatened species listed under the Endangered Species Act, having been unlawfully taken and killed by another, in

violation Section 1538 (a)(1)(B) of Title 16, United States Code, all in violation of Sections 1538(a)(1)(D) and 1540(b)(1), Title 16, United States Code; Section 2, Title 18, United States Code; and, Sections 17.21(a) and (c)(1) and 17.31, Title 50, Code of Federal Regulations.

COUNT 3

On or about February 6, 2014, in Lauderdale County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants, **TRAVIS BUTLER and CHESTER BRAD WILLIAMS**, did, knowingly and unlawfully, corruptly persuade another known to the grand jury to cause that other person to alter, destroy, mutilate, or conceal photographs of the illegally taken and possessed Louisiana Black Bear with the intent to impair the photographs' availability for use in an official proceeding, in violation of Section 1512(b)(2)(B), and Section 2, Title 18, United States Code.

COUNT 4

On or about February 6, 2014, in Lauderdale County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TRAVIS BUTLER**, did, knowingly and unlawfully, corruptly persuade another known to the grand jury to attempt to cause that other person to alter, destroy, mutilate, or conceal the hide of the illegally taken Louisiana Black Bear with the intent to impair its availability for use in an official proceeding, in violation of Section 1512(b)(2)(B), and Section 2, Title 18, United States Code.

COUNT 5

From on or about January 4, 2014, and continuing thereafter until on or about February 6, 2014, in Lauderdale County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendants **TRAVIS BUTLER, CHESTER BRAD WILLIAMS, and DAVID LUCAS WIMBERLY**, did knowingly conspire to corruptly:

1. Destroy, mutilate, and conceal records, photographs and hide of the illegally taken and possessed Louisiana Black Bear, with the intent to impair their integrity or availability for use in an official proceeding; and,
2. Obstruct, influence, or impede an official proceeding or attempt to do so.

It was part of the conspiracy that the defendants would destroy evidence and provide false information about the killing of the Louisiana Black Bear and the actions taken to have the Louisiana Black Bear mounted as a trophy to prevent its use in an official proceeding as prohibited by Section 1512(c)(1) and (2), Title 18, United States Code.

In furtherance of the conspiracy and to effect the objectives of the conspiracy, the following acts, among others, were committed in the Southern District of Mississippi and elsewhere:

(a) On January 4, 2014, in the Southern District of Mississippi, **BUTLER** caused to be killed a Louisiana Black Bear.

(b) On January 4, 2014, **BUTLER** and **WILLIAMS** loaded the bear into **BUTLER**'s truck and transported it to **WIMBERLY**'s taxidermy in Lauderdale County, Mississippi.

(c) On February 6, 2014, **BUTLER** possessed the skull of the Louisiana Black Bear as a trophy display in his residence.

(d) On February 6, 2014, **BUTLER** misrepresented to federal agents that the bear skull was that of a wolf which had belonged to a relative.

(e) On February 6, 2014, after agents interviewed him, **BUTLER** called **WILLIAMS** to tell him what to say to agents and to have a minor delete all photographs of the Louisiana Black Bear from his phone.

(f) On February 6, 2014, **WILLIAMS** caused photographs of the Louisiana Black Bear to be deleted from a cellphone.

(g) On February 6, 2014, after agents interviewed him, **BUTLER** called **WIMBERLY** to inform him that law enforcement was “on to him” and directed **WIMBERLY** to get rid of the bear hide.

(h) On February 6, 2014, **WIMBERLY** deleted all entries from his computer, burned the “intake order tag,” and removed the bear hide from his taxidermy freezer and placed it in the bed of his pickup truck for disposal.

All in violation of Section 1512(k), Title 18, United States Code.

COUNT 6

On or about February 6, 2014, in Lauderdale County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TRAVIS BUTLER**, in a matter within the jurisdiction of the United States Fish and Wildlife Service (USFWS), an agency of the United States of America, did willfully and knowingly make a material false statement, in that **TRAVIS BUTLER** stated to agents of the USFWS that the Louisiana Black Bear was loaded into the back of his pickup and dumped at a location near his home at 7:00 p.m.; that the skull found in his living room is not the skull from the black bear that was dumped; and, that he took no pictures of the black bear,” when **BUTLER** knew the statements to be false, in violation of Section 1001, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant, **TRAVIS BUTLER**, shall forfeit to the United States:

all fish or wildlife or plants taken, possessed, sold, purchased, offered for sale or purchase, transported, delivered, received, carried, shipped, exported, or imported contrary to the provisions of the Endangered Species Act, any regulation made pursuant thereto, or any permit or certificate issued thereunder; and,

All guns, traps, nets, and other equipment, vessels, vehicles, aircraft, and other means of transportation used to aid the taking, possessing, selling, purchasing, offering for sale or purchase, transporting, delivering, receiving, carrying, shipping, exporting, or importing of any fish or wildlife or plants in violation of the Endangered Species Act, any regulation made pursuant thereto, or any permit or certificate issued hereunder.

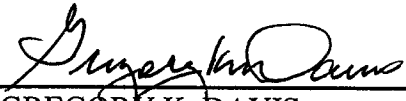
Specifically, the following property is subject to forfeiture as a result of one or more of the offenses alleged in this indictment:

One Dark Colored 2004 Chevrolet pickup VIN #1GCGK23U44F150926.

Further, if any property described above, as a result of any act or omission of the defendant, **TRAVIS BUTLER**: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant,

TRAVIS BUTLER, up to the value of the property described in this count or any bill of particulars supporting it.

All pursuant to Section 1540(e), Title 16, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This Indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 5th day of August, 2014.


UNITED STATES MAGISTRATE JUDGE